IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF ILLINOIS EASTERN DIVISION

| AUTO UNDERWRITERS PORTFOLIO ACQUISITION COMPANY, INC., a Texas corporation, AUTO UNDERWRITERS FINANCE COMPANY, INC., a Texas Corporation, AUTO UNDERWRITERS OF AMERICA, a California corporation, |) Case Number 07 C 7160))) |
|---|--|
| Plaintiffs, | Honorable Judge David H. Coar) |
| V. | |
| AGM, LLC, a Delaware limited liability company, |))) |
| Defendant. |) |

AGREED MOTION FOR EXTENSION OF TIME TO ANSWER OR OTHERWISE RESPOND TO PLAINTIFFS' COMPLAINT

Pursuant to Rule 6(b) of the Federal Rules of Civil Procedure, Defendant AGM, LLC ("AGM" or "Defendant"), through its attorneys, hereby respectfully moves the Court for an extension of time of thirty (30) days, until February 8, 2008, for Defendant to respond to Plaintiffs' Complaint. In support of this motion, Defendant respectfully states:

- 1. On December 20, 2007, Plaintiffs electronically filed their Complaint against AGM.
- 2. Counsel for Defendant has been discussing several issues with counsel for Plaintiffs, including the issue of the Court's jurisdiction over this matter.
- 3. Counsel for Defendant and counsel for Plaintiffs require additional time to discuss these issues before Defendant files a response to the Complaint.
- 4. This request for an extension of time is not made for purposes of delay or to prejudice any party.

Counsel for the Defendant and counsel for Plaintiffs have conferred regarding this 5. request for an extension of time and counsel for Plaintiffs has no objection to such extension.

WHEREFORE, Defendant requests that the Court enter an order extending the time for Defendant to respond to Plaintiffs' Complaint by 30 days, or until February 8, 2008.

DATED: January 9, 2008 __/s/ David J. Stagman

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